

Nutter, McClennen & Fish, LLP

Seaport West
 155 Seaport Boulevard
 Boston, MA 02210-2604
 (617) 439-2000

Client No.: 0104614

March 26, 2013

Resp. Atty.: PJA

Bill No. 451924/03SLW

Sovereign Bank New England
 75 State Street
 Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through February 28, 2013 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)**Cost Center:** 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
02/01/13	Prepare for and attend telephone conference with S. Morris and J. Bowen (.8); legal research regarding motion for protective order (1.8)	JDP	2.60
02/01/13	Drafting motion for protective order and affidavit [REDACTED] [REDACTED]	HSB	3.00
02/01/13	Review multiple emails from S. Bovarnick; attention to deposition details; review documents produced to date; consider motion to compel future production of documents; attention to file; consider [REDACTED] [REDACTED] attention to case history memorandum; review notice of deposition for M. Lee	JFC	5.20
02/02/13	Draft emergency motion for protective order and reply brief in support of summary judgment	JDP	3.20
02/02/13	Continued review of file and documents produced to date; review multiple emails from S. Bovarnick; attention to deposition of Morgan Estates; review bio details regarding S. Rice; attention to press release concerning S. Rice; attention to deposition notices issued to Sovereign Bank	JFC	4.20
02/03/13	Draft reply brief in support of summary judgment and emergency motion for protective order	JDP	7.40

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02/03/13	Reviewing J. Persky's brief for protective order; searching for [REDACTED] apex doctrine	HSB	0.50
02/03/13	Review confirmation of scheduling and Notice of Deposition for K. O'Brien's wife; review notice of deposition for Morgan Estates; instructions regarding deposition notices; emails from S. Bovarnick	JFC	1.80
02/04/13	Continue drafting emergency motion for protective order (2.0); revisions to Rice letter and various emails regarding same (1.0)	JDP	3.00
02/04/13	Drafting motion for protective order and affidavit for Juan Davila and re-drafting as per discussion with J. Persky	HSB	5.20
02/04/13	Work on discovery issues; review draft letter to S. Rice regarding subpoena compliance and filing motion to compel; multiple emails from S. Bovarnick; review email from M. Russo regarding alternate deposition dates for M. Russo; review counter claimants Expert Witness Disclosure and Exhibit A; attention to Juan Davilla affidavit in support of Motion for Protective Order	JFC	4.70
02/05/13	Prepare for and attend conference with Russo (.5); Summary email to Bowen and Morris (.5); Draft motion for protective order (4.0)	JDP	5.00
02/05/13	Research [REDACTED] "estate planning purpose"	HSB	4.20
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/05/13	File review; develop strategy; review discovery; analyze summary judgment arguments; telephone conference with Mark Russo; follow-up communications regarding same	EPM	4.70
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/06/13	Attention to research regarding estate-planning defense (.5); draft reply brief in support of motion for summary judgment (3.8); email to client requesting information for Davila and Lee affidavits (.6)	JDP	4.90
02/06/13	Research regarding [REDACTED] "estate planning purpose" (review articles, federal and state law); conference with J. Persky regarding research findings and next steps; formulating questions for Juan Davila; organizing preparation of filings binder for E. Magnuson	HSB	10.20

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT
FEDERAL TAX ID: 04-2106505

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02/06/13	File review; develop strategy; outline motion for protective order; develop deposition strategy; communications with CA counsel; analyze summary judgment arguments	EPM	5.00
02/07/13	Email to Russo re depositions (.4); letter to Judge Almond (.3); attention to reply memorandum (1.2)	JDP	1.90
02/07/13	Finalize research; conference with P. Brown regarding estate planning; draft estate planning memorandum	HSB	7.50
02/07/13	File review; review summary judgment filings; draft opposition to motion for summary judgment; communications regarding affidavits for motion for protective order; analyze Guaranty	EPM	3.80
02/08/13	Revisions to reply brief in support of summary judgment	JDP	4.30
02/08/13	Case law research regarding [REDACTED]; drafting estate planning memorandum and cite check Sovereign reply brief in support of summary judgment	HSB	3.80
02/08/13	Draft/edit opposition to motion for summary judgment; analyze law and facts; review court papers and pleadings; develop strategy; communications regarding affidavits	EPM	5.40
02/10/13	Draft memorandum in support of motion for protective order	JDP	1.50
02/10/13	Further drafting of estate planning memorandum	HSB	2.70
02/11/13	Revisions to memorandum in support of motion for protective order	JDP	1.90
02/11/13	Review pleadings and court papers; edit/draft motion for protective order; review communications with client regarding affidavits; edit affidavit; develop strategy for oral argument on summary judgment	EPM	2.00
02/12/13	Attention to drafting of motion to stay discovery and motion for protective order	JDP	3.50
02/12/13	Conference with J. Persky regarding estate planning memorandum	HSB	0.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/12/13	Analyze discovery; review documents; develop strategy; outline/draft motion to stay; review research in connection with same	EPM	4.00
02/13/13	Revisions to motion to stay discovery	JDP	2.10

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02/13/13	Proofreading and cite checking motion for partial stay of discovery	HSB	1.00
02/13/13	Draft motion for stay of discovery; draft motion for protective order; draft motion regarding hearing; analyze research; review discovery; develop strategy; communications with client	EPM	7.50
02/14/13	Attention to supplemental document production	JDP	2.40
02/14/13	Re-drafting estate planning memorandum	HSB	4.50
02/14/13	Develop strategy; communications with John Bowen and Steve Morris	EPM	0.40
02/15/13	Review documents for production (2.1); message for Dorsey (.1); attention to O'Brien finances (.3)	JDP	2.60
02/18/13	Analyzing [REDACTED] [REDACTED] to be used for his deposition	HSB	2.50
02/19/13	Analyze estate planning defense (.8); attention to supplemental document production (1.6); attention to issues surrounding discovery cut-off date and draft motion to extend time for discovery (2.3)	JDP	4.70
02/19/13	Analyzing [REDACTED] estate planning defense; analyzing [REDACTED] [REDACTED] to be used for his deposition	HSB	5.00
02/20/13	Analyzing [REDACTED] estate planning defense; analyzing Kevin O'Brien's [REDACTED] [REDACTED] to be used for his deposition	HSB	6.00
02/21/13	Call with Dorsey (.2); attention to issues regarding Rice subpoena and contempt (.4)	JDP	0.60
02/21/13	Analyzing and drafting memorandum regarding [REDACTED] [REDACTED] estate planning defense	HSB	5.30
02/22/13	Attention to issues concerning Rice documents and email to counsel (.6); review Judge Almond decision and transmit to client (.4); attention to estate planning defense (.2)	JDP	1.20

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
02/22/13	Communications regarding discovery strategy	EPM	0.40
02/25/13	Prepare outline of summary judgment argument (2.7); prepare for hearing on motions to compel (.3)	JDP	3.00
02/25/13	Attention to discovery disputes and related matters; analyze summary judgment papers; review transcript and documents	EPM	2.50
02/26/13	Prepare for and attend conference with Russo (.6); memorandum re estate planning defense (.7); prepare for hearing on motions to compel (1.7)	JDP	3.00
02/26/13	Analyzing Kevin O'Brien's to be used at his deposition	HSB	3.70
02/26/13	Review correspondence; email and telephone communications with opposing counsel regarding discovery; prepare for oral arguments	EPM	1.50
02/27/13	Prepare for hearings on summary judgment and discovery motions	JDP	3.90
02/27/13	Review record, cases, arguments; review pleadings and transcript; prepare for oral argument	EPM	4.00
02/28/13	Review record; analyze arguments; prepare for summary judgment oral argument; analyze communications with opposing counsel	EPM	6.00
02/28/13	Researching and analyzing	HSB	3.60
02/28/13	Prepare for summary judgment and discovery motion hearings	JDP	4.30
Total Hours for Matter 00051			199.3
Total Time for Matter 00051			\$54,042.00

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Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Coffey, James F.	[REDACTED] 15.90	360.00	[REDACTED] 5,724.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Magnuson, Eric P.	47.20	360.00	16,992.00
Associates			
Blackwood, Hilary S.	69.20	230.00	15,916.00
Persky, Jonathan D.	67.00	230.00	15,410.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Time for Matter 00051			[REDACTED] \$54,042.00
Total for Services			[REDACTED] \$54,042.00

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
02/01/13	Telephone	7.66
02/03/13	Westlaw	30.30
02/04/13	Federal Express	28.02
02/06/13	Filing Fee	50.00
02/06/13	Federal Express	13.07
02/06/13	Westlaw	4.80
02/08/13	Westlaw	115.35
02/11/13	Service of Process	149.00
02/12/13	Westlaw	9.75
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

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[REDACTED]	[REDACTED]	[REDACTED]
02/13/13	Westlaw	9.75
02/18/13	Westlaw	26.58
02/25/13	Westlaw	62.99
02/27/13	Westlaw	57.71
02/28/13	Westlaw	8.85
02/28/13	Computer Aided Research	53.20
Total Disbursements and Other Charges		739.11

Total of This Bill		\$54,781.11
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]